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Attorneys for Defendants
IRICO GROUP CORP. AND
IRICO DISPLAY DEVICES CO., LTD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No.: 07-cv-05944 JST

MDL No. 1917

This document relates to:

ALL ACTIONS

**DECLARATION OF JEFFREY B.
MARGULIES IN SUPPORT OF
DEFENDANTS IRICO GROUP CORP.
AND IRICO DISPLAY DEVICES CO.,
LTD.'S ADMINISTRATIVE MOTION TO
SEAL PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5**

1 I, Jeffrey B. Margulies, declare as follows:

2 1. I am a member of the bar of the State of California and admitted to practice before
3 this Court. I am an attorney with Norton Rose Fulbright US LLP, which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Defendant Irico Group Corporation and Irico Display Devices Co., Ltd.’s Motion to Seal pursuant
7 to Civil Local Rules 7-11 and 79-5(f) (the “Motion”).

8 2. Except for those matters stated on information and belief, about which I am
9 informed and which I believe to be true, I have personal knowledge of the facts set forth herein
10 and, if called upon, could and would competently testify thereto under oath.

11 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306)
12 (“Protective Order”) in this matter.

13 4. Pursuant to Civil Local Rules 7-11 and 79-5(d) and the Protective Order, I make this
14 declaration on behalf of the Irico Defendants to provide the basis for the Court to maintain under
15 seal certain documents and information designated by the Irico Defendants as “Confidential”
16 pursuant to the Protective Order.

17 5. Attached hereto as Exhibit 16 is a true and correct copy of a certified translation of
18 Su Xiaohua’s Employee Registration Form, Bates stamped IRI-CRT-00031561E. It should be
19 maintained under seal in its entirety because it contains Su Xiaohua’s personal identifying and
20 contact information.

21 6. Attached hereto as Exhibit 20 is a true and correct copy of a certified translation of
22 a WeChat text message exchange between Su Xiaohua and Zhang Wenkai (represented by the
23 screen name Baichigantou), Bates stamped IRI-SU-000103E, dated January 17 through May 26,
24 2022. It should be maintained under seal in its entirety because it contains Su Xiaohua’s sensitive
25 personal identifying, including but not limited to scanned copies of his household registration
26 information and identification cards, contact information, and medical information.

1 7. Attached hereto as Exhibit 21 is a true and correct copy of IRI-SU-000137E and a
2 certified English translation of IRI-SU-000137E, dated May 25, 2022. It should be maintained
3 under seal in its entirety because it contains Su Xiaohua's personal information.

4 8. Attached hereto as Exhibit 22 is a true and correct copy of IRI-SU-000141E and a
5 certified English translation of IRI-SU-000141E, dated July 17, 2022. It should be maintained under
6 seal in its entirety because it contains Su Xiaohua's personal information.

7 9. Attached hereto as Exhibit 23 is a true and correct copy of IRI-SU-000208E and a
8 certified English translation of IRI-SU-000208E, dated July 17, 2022. It should be maintained under
9 seal in its entirety because it contains Zhang Jiming's personal information.

10 10. Attached hereto as Exhibit 24 is a true and correct copy of IRI-SU-001473E and a
11 certified English translation of IRI-SU-001473E, dated February 16, 2019. It should be maintained
12 under seal in its entirety because it contains competitively sensitive information regarding Irico
13 employees' salaries and wages.

14 11. Attached hereto as Exhibit 25 is a true and correct copy of IRI-SU-001470E and a
15 certified English translation of IRI-SU-001470E, dated July 1, 2022. It should be maintained under
16 seal in its entirety because it contains competitively sensitive information regarding Irico
17 employees' salaries.

18 12. Attached hereto as Exhibit 27 is a true and correct copy of IRI-SU-000166E and a
19 certified English translation of IRI-SU-000166E, dated September 19, 2022. It should be
20 maintained under seal in its entirety because it contains competitively sensitive information
21 regarding Irico's operations and personal information regarding Su Xiaohua.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on the 13th day of June 2024 at San Francisco, California.

24
25 /s/ Jeffrey B. Margulies
26 JEFFREY B. MARGULIES
27
28

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Declaration of Jeffrey B. Margulies** was filed via CM/ECF on June 13, 2024, and as a result has been served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: Matthew Park
Matthew Park